

PINNOCK & WAKEFIELD

A Professional Corporation

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

NONI GOTTI;

Plaintiff,

v.

**PLAZA SQUARE, LTD.; HONEYBEE
FOODS CORP; DBA JOLLIBEE; WING
BIZ INC DBA WINGS N THINGS; CHRIS
CHRIS ENTERPRISES INC DBA LITTLE
CAESARS; SANG K. LEE DBA BASKIN-
ROBBINS ICE CREAM; SATHAPHONE
KHAMPHAU & QUAN LIOU KHAMPHAU AKA
MICHAEL WONG & SENG DEVANE DBA
PLAZA COIN LAUNDRY; EMILIA T.
HERNANDEZ DMD; KEDDINGTON & KALRA
OPTEOMERISTS APC DBA EYE CARE
OPTOMETRY ASSOCIATE; ANNABELLE
MATTOX DBA ANABEL HAIR AFFAIR; H
& R BLOCK INC; LOAN NGUYEN DBA
CHARLENES NAILS; KIM PHAT JEWELRY
AND REPAIR CORP.; GIFTS AND
FAVORS; HOLLYWOOD MUSIC; MOMMY
AND ME; DR BRADFORD EMERY; And
DOES 1 THROUGH 10, Inclusive**

Defendants.

Case No.: 08cv1029 WQH (POR)

**JOINT MOTION FOR DISMISSAL AND
DISMISSAL WITH PREJUDICE OF ALL
DEFENDANTS AND PLAINTIFF'S
COMPLAINT IN ITS ENTIRETY**

[Fed.R.Civ.P. Rule 41(a)(2)]

1
2 **IT IS HEREBY JOINTLY MOVED** by Plaintiff, on the one hand,
3 and appearing Defendants via their respective attorneys of record
4 that, pursuant to Federal Rules of Civil Procedure, Rule 41
5 (a)(1) and (2), this Court enter a dismissal **with** prejudice of
6 all Defendants from Plaintiff's Complaint, Case Number: 08cv1029
7 WQH (POR). Additionally, Plaintiff requests Plaintiff's Complaint
8 be dismissed **with** prejudice in its entirety.

9 The dismissal shall apply to all defendants, including
10 without limitation H&R Block Enterprises, Inc., incorrectly sued
11 as H&R Block, Inc., which Plaintiff acknowledges is the entity
12 appearing in this case, and to any and all other defendants named
13 in this action regardless of whether they have appeared in this
14 case.

15
16 **IT IS SO JOINTLY MOVED.**

17
18 Dated: July 11, 2008

PINNOCK & WAKEFIELD, A.P.C.

19
20
21 By: s/ Theodore A. Pinnock, Esq.
22 Attorney for Plaintiffs
23 E-mail: pinnock99@aol.com

24 Dated: July 11, 2008

SOLOMON WARD SEIDENWURM & SMITH LLP

25 By: s/Daniel E. Gardenswartz
26 Daniel E. Gardenswartz, Esq.
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28 Defendants
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PROOF OF SERVICE VIA ECF

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AND ME; DR BRADFORD EMERY; And
DOES 1 THROUGH 10, Inclusive**

Defendants.

On this date, I served the following document(s) described as JOINT MOTION FOR DISMISSAL AND DISMISSAL WITH PREJUDICE OF ALL DEFENDANTS AND PLAINTIFF'S COMPLAINT IN ITS ENTIRETY on all Defendants in this action BY:


X placing _____ the original X a true copy thereof as stated below:

Daniel E. Gardenswartz, Esq.
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Attorney for DEFENDANTS

X BY ELECTRONIC MAIL: I am readily familiar with the firm's practice of collection and processing correspondence for electronic mailing. Under that practice, it would be electronically mailed to the electronic mail box address that is registered with the district court.

X FEDERAL: I declare that I am employed in the office of a member of the Bar of this Court, at whose direction this service was made.

EXECUTED on July 11, 2008, at San Diego, California.



Jennifer A. Watson